FEDERAL PUBLIC DEFENDER

CENTRAL DISTRICT OF CALIFORNIA 321 EAST 2nd STREET LOS ANGELES, CALIFORNIA 90012-4202 213-894-2854 213-894-1221 FAX

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June 30, 2020

Hon. Scott S. Harris, Clerk Supreme Court of the United States 1 First Street, NE Washington DC 20543

Re:

Hooman Ashkan Panah v. Ron Broomfield, Case No. 19-8009

Motion to Defer Distribution of cert petition

Dear Mr. Harris,

I represent Petitioner Hooman Ashkan Panah in the above-captioned case. The opposition to the petition for writ of certiorari was filed on June 16, 2020. Pursuant to Rule 30.4 and this Court's Guidance Concerning Clerk's Office Operations under the COVID-19 pandemic, I respectfully request that the Court defer distribution of Petitioner's cert petition.

I am requesting a deferral of distribution to ensure that I have adequate time to file a reply to Respondent's opposition to Petitioner's cert petition. Because of the COVID-19 restrictions, including stay-at-home guidelines, personal obligations, and the inability to consult with my client as a result thereof, I have been unable to complete a Reply Brief within the normal 14-day time frame. Indeed, San Quentin State Prison, where Petitioner is incarcerated, is facing a mounting COVID-19 outbreak that has prevented me from visiting and—most recently—talking on the phone with my client to discuss the Brief.

I anticipate being able to file a Reply Brief by July 14, 2020. Accordingly, I request that the Court defer distribution of the cert petition in this case until after that date.

Sincerely.

Joseph A. Trigilio

Deputy Federal Public Defender Counsel of Record for Petitioner

No. 19-8009

IN THE

Supreme Court of the United States

Hooman Ashkan Panah

Petitioner,

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Ron Broomfield, Acting Warden

Respondent

On Petition for a Writ of Certiorari to the United States Court of Appeals for the Ninth Circuit

CERTIFICATE OF SERVICE

I, JOSEPH A. TRIGILIO, a Deputy Federal Public Defender in the Office of the Federal Public Defender who was appointed as counsel for Petitioner under the Criminal Justice Act, 18 U.S.C. § 3006(A)(b), hereby certify that on June 30, 2020, a copy of MOTION TO DEFER DISTRIBUTION OF CERT PETITION was mailed postage prepaid to:

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Ana R. Duarte Deputy Attorney General Office of the CA Attorney General 300 South Spring Street., Ste 702 Los Angeles, CA 90013

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 30, 2020.

JOSEPH A. TRIGILIO
Attorney for Petitioner
Counsel of Record